

**United States Bankruptcy Court**  
**Eastern District of Michigan**

In re Tamara Lynn Stokes

Case No. 13-41341

In re William Harvey Stokes

Chapter 13

**Ex Parte Motion to Vacate Dismissal and Reinstate the Case**

Now comes Kathleen Brown, attorney for Tamara Stokes and William Harvey Stokes, and respectfully moves this Honorable Court to vacate the dismissal of the case and to reinstate it. In support of her motion, she states as follows;

1. Attorney Brown had technical difficulties with her bankruptcy preparation filing software that she was not able to resolve in a timely manner.
2. Brown planned on meeting with an attorney/friend on August 21, 2013 to go over the Chapter 13 Plan. This is Brown's first Chapter 13 case, and as such, she has been consulting him as she prepares the case.
3. An hour before their scheduled meeting, Brown's attorney friend experienced a death in the family. Brown was unaware of the situation and continued to wait for her attorney friend. It was fairly late in the day when she realized that her friend was not going to be coming.
4. Since then, the Plan and Form 22C are ready to file and are attached to this motion.

*Wherefore*, Counsel prays for the relief requested, that of vacating the dismissal and reinstating the case.

Respectfully submitted by:

/s/ Kathleen Brown Dated: 8/24/2013

Kathleen Brown P46559  
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**Order**

This matter having come before the Court, and the Court being fully advised on the premises, the Court does grant the Motion and reinstates the Case.

\_\_\_\_\_  
Honorable Thomas J. Tucker

\_\_\_\_\_  
Date

